

REMARKS

Claims 1, 3-7, 9-17, 19-25, 27-31, 33-41, 43-51, 53-55 and 57-64 are pending and stand rejected. In response, claims 1, 19, 25, 43, 49, 53 and 57-64 are amended. Claims 65 and 66 are added. Support for new claims 65 and 66 is found throughout the specification, including at paragraphs 51-53. Claims 1, 3-7, 9-17, 19-25, 27-31, 33-41, 43-51, 53-55 and 57-66 are pending upon entry of this amendment.

Response to Rejections Under 35 USC 103(a)

Claims 1, 3-7, 9-17, 19-25, 27-31, 33-41, 43-51, 53-55 and 57-64 stand rejected under 35 USC § 103(a) as allegedly being unpatentable over Belfiore et al. (U.S. Patent Publication US 2002/0059425 A1 “Belfiore”) in view of Gross et al. (U.S. Patent 5,555,346) and further in view of Gruen et al., (U.S. Patent Publication US 2005/0057584 A1 “Gruen”). Applicants respectfully traverse this rejection as applied to the amended claims.

Amended independent claim 1 now recites:

A method comprising:

- determining an occurrence of a condition indicating at least one transfer of an email message by an email application, wherein determining the occurrence of the condition is external to the email application;
- identifying event data associated with the email message;
- compiling an email event from at least some of the event data;
- associating the email event with a first conversation based at least in part on the event data, the first conversation comprising a first thread of related email messages;
- associating the email event with a second conversation related to the first conversation, the second conversation comprising a second thread of related email messages; and**
- storing the email event, the association with the first conversation, the association with the second conversation, and the email message.

Independent claims 25, 49, and 53 recite similar features. An advantage of the claimed invention is that, in addition to associating an email event with a first conversation comprising a first thread of related email messages, it also associates the email event with a second conversation comprising a second thread of related email messages. Associating the email event with the second conversation improves the ability of a user to find email messages related to the email event. Support for the amended claims is found throughout the specification, including at paragraphs 51-53.

Gruen does not disclose at least the claimed feature, “associating the email event with a second conversation related to the first conversation, the second conversation comprising a second thread of related email messages.” Gruen describes processing an email to form an associated conversation thread tree. *See* Gruen, [0048]. The conversation thread tree is comprised of an original (*parent*) email and emails identified as replies (*children*) to the original email. *See* Gruen, [0048]-[0049]. However, Gruen associates the email with only a single conversation. If an email in the conversation thread tree is deleted, the conversation thread tree is altered to include a shadow document as a placeholder for the deleted email, but the resulting conversation thread tree still represents the **same** conversation. *See* Gruen, [0060]. Hence, Gruen fails to disclose or suggest at least the claimed feature, “associating the email event with a second conversation related to the first conversation, the second conversation comprising a second thread of related email messages.”

Gross fails to remedy the above-described deficiencies of Gruen. The Examiner points to FIG. 31 as allegedly disclosing associating an email event with a conversation. However, the *conversation* referred to in Gross is entirely different than the “conversation”

recited in the claimed invention. Gross explains that the term *conversation* is used solely to describe a *dynamic data exchange* between two applications (e.g., a mail messaging system and a DDE server application). *See* Gross, col. 6, line 58 - col. 7, line 30. This is entirely unrelated to a “conversation comprising a thread of related email messages” as recited in the claims. As Gross clearly does not even disclose “associating the email event with a first conversation ... comprising a first thread of related email messages,” it follows that Gross also does not disclose or suggest, “associating the email event with a second conversation related to the first conversation, the second conversation comprising a second thread of related email messages.” Therefore, at the time of the invention, the claimed invention would not have been obvious to a person of ordinary skill in the art in view of Gruen and Gross, either alone or in combination.

Belfiore does not remedy the above-described deficiencies of Gruen and Gross, nor does the Examiner assert that it does. Belfiore merely describes a distributed computing services platform that uses an eXtensible Markup Language (XML) to facilitate communication between servers and/or client devices. As indicated by the Examiner, Belfiore fails to expressly disclose several features of the claimed invention, including *associating the email event with a conversation*. Belfiore does not disclose or suggest at least the claimed feature “associating the email event with a second conversation related to the first conversation, the second conversation comprising a second thread of related email messages.”

Applicants respectfully submit that Belfiore, Gross, and Gruen, alone or in any combination, fail to disclose or suggest at least “associating the email event with a second

conversation related to the first conversation, the second conversation comprising a second thread of related email messages.” Accordingly, a person of ordinary skill in the art would not find the claimed invention obvious in view of the cited references.

Hence, Applicants respectfully submit that independent claims 1, 25, 49, and 53 are patentably distinguishable over any combination of Belfiore, Gross, and Gruen. In addition to reciting other patentable features such as “analyzing a time gap between the email event and the related email messages in the first conversation” and “responsive to the time gap exceeding a certain amount of time, associating the email event with a new conversation,” dependent claims 3-7, 9-17, 19-24, 27-31, 33-41, 43-48, 50-51, 54-55 and 57-66 incorporate the elements of their respective base claims and are patentably distinguishable for at least the same reasons.

Dependent claims 15 and 39 stand rejected under 35 USC § 103(a) as allegedly being unpatentable over Belfiore in view of Dumais et al. (U.S. Patent Publication US 2004/0267700 “Dumais”). Dumais does not remedy the above-described deficiencies of Belfiore, Gruen, and Gross, nor does the Examiner assert that it does. Dumais merely describes an information retrieval system and is cited only as allegedly showing determining if a packet received from a network comprises an email protocol. Dumais does not disclose or suggest at least the claimed feature “associating the email event with a second conversation related to the first conversation, the second conversation comprising a second thread of related email messages.” Hence, Applicants respectfully submit that dependent claims 15 and 39 are also patentable over any combination of the cited references for at least the same reasons as their base claims.

In sum, Applicants respectfully submit that the pending claims are not taught or suggested by the art of record, and request that the current rejections be withdrawn and the application allowed. The Examiner is invited to contact the undersigned by telephone to advance the prosecution of this application.

Respectfully Submitted,
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